



Air Quality Permitting Response to Public Comments

August 3, 2017

**Permit to Construct No. P-2016.0055
Project 61789**

**J.R. Simplot Company – Don Siding Pocatello
Pocatello, Idaho**

Facility ID No. 077-00006

Prepared by:
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AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for J.R. Simplot Company – Don Siding Pocatello from March 7, 2017 through April 6, 2017, in accordance with IDAPA 58.01.01.209.01.c.

DEQ provided for a second public comment period from May 2, 2017 through June 1, 2017. The second comment period was provided due to inadvertently omitted information pertaining to the consent order between DEQ and Simplot and the ambient impact analysis for PM₁₀.

During both periods, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at:

<http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

COMMENTS SUBMITTED ON 4/5/17

Comment 1: DEQ's Statement of Basis states that an ambient air quality impact analysis will not be performed as part of this permitting action. This analysis was not required for this project because there were no proposed emissions increases. We are concerned about this decision because it is unclear if an ambient air quality impacts analysis has ever been performed for the cumulative emissions from this facility.

According to the Application Scope section, this PTC replaces a Tier II permit and five different existing PTCs. While some of these existing permits have included modeling analyses, the scope of those analyses would have been limited to include only the emission sources listed within each individual permit. It therefore seems appropriate for the DEQ to require an ambient air quality impacts modeling analysis as part of this permitting process in order to address the cumulative impacts from all emission sources throughout this facility. Without this information, it seems there is not enough information available to demonstrate that ambient air quality will not be impacted from the operations at this facility.

Response 1: As stated in the Statement of Basis, this PTC replaces a Tier II operating permit and five different PTCs. The application fulfills the requirements of the IDEQ consent order signed on June 27, 2016. Paragraph 10.B of the consent order requires that Simplot submit a complete PTC application to incorporate the following into a new PTC:

The existing PM₁₀ emission limits for the Ammonia Sulfate Plate, Granulation No. 1 Process and Granulation No. 2 Process from the Tier II permit issued on December 3, 1999.

The existing PM emission limits for Granulation No. 3 process contained in the PTC issued on December 12, 2001.

The revised PM₁₀ hourly emissions limits and the corresponding PM₁₀ annual emissions limits for the Phosphoric Acid Manufacturing Plant.

Paragraph 12.B of the consent order requires Simplot to submit a complete PTC application which includes the following:

A request to convert Tier II Operating Permit No. 077-00006, issued December 3, 1999, into a PTC;

A request to replace the PTC issued in 2001 for the Granulation 3 process with this new PTC;

A voluntary request to include the emission limits from the 2004 RACT Consent Order in the new PTC for administrative and compliance ease; and

A request to revise the hourly and annual PM₁₀ emission limits based on the performance testing using EPA Reference Test Methods 201 and 202 for the Phosphoric Acid Manufacturing Plant.

In the consent order Simplot agrees to resolve remaining PM₁₀ compliance issues by reducing fluoride emissions and replacing the existing reclaim cooling towers with a low emission alternative or incorporating measures that provide greater than 50% in fluoride emissions reductions. Simplot must also install, maintain and operate a PM₁₀ monitor and meteorological monitoring equipment for at least three years without recording a violation of the PM₁₀ NAAQS. The monitor is scheduled to be installed by June 27, 2017.

In addition, the IDEQ consent order with Simplot requires that Simplot submit a Remedial Action Plan (RAP) within 365 days of the effective date of the consent order to IDEQ for its approval, which outlines the schedule for a technology analysis plan, pilot plan, technology selection, design, construction and testing for fluoride emissions reductions, any alternative performance testing methods, and a plan and timeline for revising the PM₁₀ hourly and annual emissions limits for the reclaim cooling towers and completing an ambient impact analysis for PM₁₀. A copy of the consent order has been added to the Statement of Basis as Appendix C.

The scope of this permitting action is to consolidate existing permits. The proposed action does not involve a physical modification to the facility and does not change allowable air pollutant emissions. A complete ambient impact analysis for PM₁₀ that assures compliance with IDAPA 58.01.01.203.02 is required to be submitted per the consent order within the timeframes agreed upon in the RAP.

Comment 2: Permit condition 2.7 requires that fugitive emissions of PM₁₀ be reasonably controlled and are not to exceed the thresholds of 0.01 lb/hr and 0.03 T/yr. It is unclear what monitoring and reporting provisions are in place to ensure that the facility complies with this permit condition. We ask the DEQ to please clarify how compliance with this permit condition will be demonstrated, and if necessary, include additional permit conditions that detail the monitoring and reporting required to measure and control fugitive PM₁₀ emissions from this facility.

Response 2: Permit Condition 2.7 is incorporated into the current PTC from Tier II Operating Permit No. 077-00006 which was issued on December 3, 1999. This permit condition is for uncaptured fugitive PM₁₀ emissions at the Phosphoric Acid Plant and was taken from the PM-10 Air Quality Improvement Plan for Power and Bannock Counties dated May 1993. Compliance with fugitive PM₁₀ limits is determined by the Fugitive Dust section (Permit Conditions 2.1 through 2.4) of the Tier I Operating Permit. These permit requirements include conducting monthly fugitive dust inspections, maintaining records of fugitive dust control measures, tracking fugitive dust complaints and corrective actions taken.

Because the permit condition is a fugitive emission limit from the Phosphoric Acid Plant and is practically unenforceable, the thresholds of 0.01 lb/hr and 0.03 T/yr will be removed from the condition. The facility will still need to reasonably control fugitive emissions in accordance with IDAPA 58.01.01.650 and 651.

COMMENTS SUBMITTED ON 5/30/17

Comment 1: Lead Emissions

Table 2 in the SOB lists the facility-wide emissions inventory potential to emit. Within this table lead is listed as having “negligible” emissions. We are concerned by the dismissal of lead emissions, as it does not appear that these emissions are in fact negligible. According to the EPA’s Toxic Release Inventory this facility released 32,152.29 lbs. (16.08 T) of lead via air emissions throughout 2015, the most recent year with available data. According to Idaho’s rules on air pollution, lead emissions amounting to 0.6 T/year or greater constitute a significant source. In light of this, facility-wide lead emissions cannot be considered negligible. These emissions need to be accounted for in PTE inventories and presumably modeled to assess impacts to ambient air quality given the magnitude of emissions.

Response 1: According to EPA’s TRI Program, in 2015 Simplot released 32,091 lbs of lead via “other surface impoundments.” A surface impoundment is a natural topographic depression, man-made excavation, or diked area formed primarily of earthen materials (although some may be lined with man-made materials), that is designed to hold an accumulation of liquid wastes or wastes containing free liquids. This facility’s lead releases via surface impoundments include the lead present in the gypsum that eventually reports to the gypsum stack. These releases are to land, not air.

According to EPA’s Toxics Release Inventory (TRI) Program, in 2015 Simplot released 3.2 lbs or 0.0016 tons of lead from stack or point air emissions. Stack or point air emissions are defined as emissions that occur through confined air streams such as stacks, vents, ducts, or pipes. These emissions are accounted for in the emission inventory in the statement of basis and are negligible.

Comment 2: SO₂ Emission Limits in Permit Condition 9.5

Simplot provided comments on the draft permit to the DEQ on January 10, 2017. One of those comments pertained to the proposed SO₂ emission limits in permit condition 9.5, in which the facility requested the following:

Simplot requests the SO₂ emissions limit in paragraph 9.5 be revised to reflect the existing limit of 999 pounds per each running three-hour period rather than 333 pounds per hour.

The DEQ agreed to this request and changed the language in permit condition 9.5 to read as follows:

Emissions of SO₂ from the No. 400 sulfuric acid plant stack shall not exceed 999 lb/hr based on a three-hour rolling average.

As an initial matter, we believe DEQ’s suggested language for Condition 9.5 misinterprets Simplot’s intent and goes beyond what the facility requested. The DEQ proposes to allow this facility to emit SO₂ at an average rate of 999 lbs/hr over a three hour period, which would produce 2,997 lbs in total emissions over that three hour period. The facility’s request, instead, asked for a total emission limit of 999 lbs. over the course of a three-hour running cycle. The result of this would be an hourly emission average of 333 lbs/hr, a third of what would currently be permitted, as demonstrated below:

	Simplot's Request	DEQ's Proposal
Hourly Emission Average:	333 lbs/hr	999 lbs/hr
Total Emission Limit (3-hour):	999 lbs	2,997 lbs

In their comments, the facility states it will not exceed an emission rate of 999 lbs per a three-hour operating period. They should therefore never exceed a rate of 333 lbs/hr averaged over a three-hour rolling average. Thus the appropriate permit limit for Condition 9.5 is a numeric value of 333 lbs/hr to be calculated using a three-hour rolling average, with the additional condition that total emissions are not to exceed 999 lbs for any three-hour period. Irrespective of DEQ's misinterpretation of Simplot's request for changes to this permit condition, the validity of the condition ultimately depends on whether it complies with the NAAQS for SO₂.

It is unclear from the SOB whether the proposed revision to Condition 9.5 complies with the applicable NAAQS for SO₂, including the primary 1-hour limit of 75 ppb and the secondary 3-hour limit of 0.5 ppm. Pursuant to IDAPA 58.01.01.203.02, a PTC cannot be granted to a new or modified stationary source unless the applicant demonstrates that the source would not cause or significantly contribute to a violation of ambient air quality standards. However, no information was provided in this SOB indicating the extent to which impacts to ambient air quality were analyzed in existing individual PTCs, nor is it clear what the cumulative effect will be as a result of combining the existing PTCs into one.

The DEQ seemed to, in part, justify this in the Ambient Air Quality Impact Analyses section of the SOB, asserting that an analysis of impacts to ambient air quality was not required as there were no proposed emission increases at the facility. But the effect of the proposed PTC would increase emissions because the proposed PTC combines the emissions of existing PTCs, concentrating previously discrete emissions. This concentration does constitute an increase of emissions, warranting an analysis of any potential impact the proposed PTC may have on ambient air quality. We are particularly concerned with potential NAAQS violations resulting from the cumulative effect of SO₂ emissions from the No. 400 sulfuric acid plant combining with emissions of simultaneous operations throughout the facility.

If information concerning the proposed PTC's impact on ambient air quality exists, the DEQ should provide this data to the public for examination and to demonstrate compliance with all applicable NAAQS standards. If this information is not available or does not exist, approval of this PTC should be delayed until it has been shown that emissions from this facility will not violate, or contribute to a violation of any NAAQS.

Response 2: The scope of this permitting action is to consolidate existing permits including Tier II Operating Permit No. 077-00006, issued December 3, 1999. Permit Condition 9.5 is incorporated from Tier II Operating Permit No. 077-00006. The SO₂ limit from the Tier II Operating Permit No. 077-00006 for the Sulfuric Acid Plant No. 400 states "Sulfur dioxide emissions shall not exceed 999 pounds per each running three-hour period."

The current permit language will be changed to exactly match the language of Tier II Operating Permit No. 077-00006 so that there can be no discrepancy in the intent of the permit condition to limit the SO₂ to 999 pounds per each running three-hour period. The intent of the permit condition as written in 1999 was to limit SO₂ emissions to 999 pounds for each three hour period.

Comment 3: Replacement of Existing Permits
Section 1.2 in the draft permit lists the existing PTCs that the proposed PTC will be replacing. However, the listed PTCs and their associated dates do not match the list of existing permits found under the Permitting History section of the Statement of Basis (SOB). We ask that the DEQ please clarify which permits are being overridden by this new PTC.

Response 3: The permitting history section of the Statement of Basis correctly identifies existing and superseded permits. Section 1.2 of the PTC correctly identified the permit issuance dates of the permits being replaced but had the incorrect naming convention on two of the PTCs. These errors have been corrected to identify all permits being replaced by the proposed PTC.

Comment 4: Incorporation of Existing Emission Limits
It appears that a number of emission limits incorporated into this PTC are taken from existing permits, with some dating back to 1999. We are concerned that simply including pre-existing emission limits may not provide sufficient protection given that the emission limits were calculated nearly 20 years ago. We encourage the DEQ and Simplot to consider revising emission limits in order to adapt to changes in air quality that have occurred over the past two decades.

Response 4: The scope of this permitting action is to consolidate existing permits and update PM₁₀ emission limits for certain sources. Both sulfuric acid plants will have updated control technologies and emission limits based on the EPA consent decree issued on December 3, 2015. The emission limits will be rolled into a future permit per the EPA consent decree schedule. This current proposed action does not involve a physical modification to the facility and does not change allowable air pollutant emissions. Therefore, emission limits will not be changed at this time.

Comment 5: Fugitive PM₁₀ Emission Limit
Permit condition 2.7 requires that fugitive emissions of PM₁₀ be reasonably controlled. In the previous draft permit available for public comment these fugitive emissions had the additional requirement that they were not to exceed the thresholds of 0.01 lb/hr and 0.03 T/yr. ICL was concerned as to how this limit was going to be enforced, and it now looks as though the DEQ simply chose to remove the quantitative permit requirement. Rather than deleting these requirements, we encourage the DEQ to retain the quantitative emission limits and require monitoring and recordkeeping to be performed to ensure that the numeric limits are met.

Response 5: Permit Condition 2.7 is incorporated into the current PTC from Tier II Operating Permit No. 077-00006 which was issued on December 3, 1999. This permit condition is for uncaptured fugitive PM₁₀ emissions at the Phosphoric Acid Plant and was taken from the PM-10 Air Quality Improvement Plan for Power and Bannock Counties dated May 1993. Compliance with fugitive PM₁₀ limits is determined by the Fugitive Dust section (Permit Conditions 2.1 through 2.4) of the Tier I Operating Permit. These permit requirements include conducting monthly fugitive dust inspections, maintaining records of fugitive dust control measures, tracking fugitive dust complaints and corrective actions taken.

Because the permit condition is a fugitive emission limit from the Phosphoric Acid Plant and is practically unenforceable, the thresholds of 0.01 lb/hr and 0.03 T/yr were removed from the condition. The facility will still need to reasonably control fugitive emissions in accordance with IDAPA 58.01.01.650 and 651.

Appendix

Public Comments Submitted for

Permit to Construct

P-2016.0055



208.345.6933 • PO Box 844, Boise, ID 83702 • www.idahoconservation.org

4/5/17

Anne Drier
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Kelli Wetzel
Air Quality Permitting Analyst
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Submitted via email: kelli.wetzel@deq.idaho.gov and anne.drier@deq.idaho.gov

RE: Air Quality PTC for J.R. Simplot Company – Don Siding, Pocatello

Dear Ms. Drier and Mr. Burnham:

Thank you for the opportunity to comment on the draft air permit to construct (PTC) for the J.R. Simplot Company - Don Siding (Simplot) facility in Pocatello, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

Our detailed comments are provided following this letter. Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Austin Hopkins".

Austin Hopkins
Conservation Associate

*RE: Idaho Conservation League comments on Air Quality PTC for J.R. Simplot Company
– Don Siding, Pocatello*

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Ambient Air Quality Impacts Modeling

DEQ's Statement of Basis states that an ambient air quality impact analysis will not be performed as part of this permitting action. This analysis was not required for this project because there were no proposed emissions increases. We are concerned about this decision because it is unclear if an ambient air quality impacts analysis has ever been performed for the cumulative emissions from this facility.

According to the Application Scope section, this PTC replaces a Tier II permit and five different existing PTCs. While some of these existing permits have included modeling analyses, the scope of those analyses would have been limited to include only the emission sources listed within each individual permit. It therefore seems appropriate for the DEQ to require an ambient air quality impacts modeling analysis as part of this permitting process in order to address the cumulative impacts from all emission sources throughout this facility. Without this information, it seems there is not enough information available to demonstrate that ambient air quality will not be impacted from the operations at this facility.

Fugitive PM₁₀ Emission Limit

Permit condition 2.7 requires that fugitive emissions of PM₁₀ be reasonably controlled and are not to exceed the thresholds of 0.01 lb/hr and 0.03 T/yr. It is unclear what monitoring and reporting provisions are in place to ensure that the facility complies with this permit condition. We ask the DEQ to please clarify how compliance with this permit condition will be demonstrated, and if necessary, include additional permit conditions that detail the monitoring and reporting required to measure and control fugitive PM₁₀ emissions from this facility.

*RE: Idaho Conservation League comments on Air Quality PTC for J.R. Simplot Company
– Don Siding, Pocatello*

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5/30/17

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Air Quality Permitting Analyst
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Boise, ID 83706

Submitted via email: kelli.wetzel@deq.idaho.gov and anne.drier@deq.idaho.gov

RE: Revised Air Quality PTC for J.R. Simplot Company – Don Siding, Pocatello

Dear Ms. Drier and Ms. Wetzel:

Thank you for the opportunity to provide additional comments on the revised draft air permit to construct (PTC) for the J.R. Simplot Company - Don Siding (Simplot) facility in Pocatello, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

Our detailed comments are provided following this letter. Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

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Austin Hopkins
Conservation Associate

RE: Idaho Conservation League supplemental comments on Air Quality PTC for J.R.

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Lead Emissions

Table 2 in the SOB lists the facility-wide emissions inventory potential to emit. Within this table lead is listed as having “negligible” emissions. We are concerned by the dismissal of lead emissions, as it does not appear that these emissions are in fact negligible. According to the EPA’s Toxic Release Inventory¹ this facility released 32,152.29 lbs. (16.08 T) of lead via air emissions throughout 2015, the most recent year with available data. According to Idaho’s rules on air pollution, lead emissions amounting to 0.6 T/year² or greater constitute a significant source. In light of this, facility-wide lead emissions can not be considered negligible. These emissions need to be accounted for in PTE inventories and presumably modeled to assess impacts to ambient air quality given the magnitude of emissions.

SO2 Emission Limits in Permit Condition 9.5

Simplot provided comments on the draft permit to the DEQ on January 10, 2017. One of those comments pertained to the proposed SO₂ emission limits in permit condition 9.5, in which the facility requested the following:

Simplot requests the SO2 emissions limit in paragraph 9.5 be revised to reflect the existing limit of 999 pounds per each running three-hour period rather than 333 pounds per hour.

The DEQ agreed to this request and changed the language in permit condition 9.5 to read as follows:

Emissions of SO2 from the No. 400 sulfuric acid plant stack shall not exceed 999 lb/hr based on a three-hour rolling average.

As an initial matter, we believe DEQ’s suggested language for Condition 9.5 misinterprets Simplot’s intent and goes beyond what the facility requested. The DEQ proposes to allow this facility to emit SO₂ at an average rate of 999 lbs/hr over a three-hour period, which would produce 2,997 lbs in total emissions over that three hour period. The facility’s request, instead, asked for a total emission limit of 999 lbs. over the course of a three-hour running cycle. The result of this would be an hourly emission average of 333 lbs/hr, a third of what would currently be permitted, as demonstrated below:

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¹ Accessed online via: https://iaspub.epa.gov/triexplorer/tri_release_chemical

² IDAPA 58.01.01.108.a.vi

In their comments, the facility states it will not exceed an emission rate of 999 lbs per a three-hour operating period. They should therefore never exceed a rate of 333 lbs/hr averaged over a three-hour rolling average. Thus the appropriate permit limit for Condition 9.5 is a numeric value of 333 lbs/hr to be calculated using a three-hour rolling average, with the additional condition that total emissions are not to exceed 999 lbs for any three-hour period. Irrespective of DEQ's misinterpretation of Simplot's request for changes to this permit condition, the validity of the condition ultimately depends on whether it complies with the NAAQS for SO₂.

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If information concerning the proposed PTC's impact on ambient air quality exists, the DEQ should provide this data to the public for examination and to demonstrate compliance with all applicable NAAQS standards. If this information is not available or does not exist, approval of this PTC should be delayed until it has been shown that emissions from this facility will not violate, or contribute to a violation of any NAAQS.

Replacement of Existing Permits

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RE: Idaho Conservation League supplemental comments on Air Quality PTC for J.R.

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Fugitive PM₁₀ Emission Limit

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RE: Idaho Conservation League supplemental comments on Air Quality PTC for J.R.

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